

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA

V.

**JOSEPH DEAN GARCIA
Defendant**

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Case No. 6:15-CR-00005

MOTION TO MODIFY SENTENCE

COMES NOW JOSEPH GARCIA, Defendant in the above-referenced case, and through his attorney of record, does hereby submit this Motion to Modify Sentence, showing this Honorable Court as follows:

BACKGROUND

The Defendant previously pled guilty to one count of Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 371. On December 16, 2015, he was sentenced by the Court to a term of thirty-seven (37) months imprisonment, three (3) years of supervised release, and other conditions which include a significant amount of restitution and restrictions on his future employment. The Defendant served his prison sentence, and he was eventually released from incarceration. He began his term of supervised release in 2018, and he has followed the requirements of that supervised release without incident since that time. His supervised release is scheduled to end in 2021.

ARGUMENT

The current terms of the Defendant's supervised release are preventing him from moving on with his life in a meaningful way and, more importantly, they are preventing the Defendant from providing full restitution to his victims. The Defendant has become a model citizen, and he

would like to further his career. Specifically, the Defendant is very talented in the staging and promotion field. He has been offered several positions, including one from Mercedes Benz that would require him to travel. These jobs would pay the Defendant significantly more than he is currently able to make, and this would put the Defendant on a better path to pay back the \$635,000 in restitution sooner.

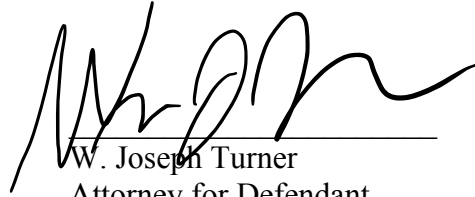
The Defendant is a shining example of how an individual can make mistakes and, by taking responsibility for his actions, change his life and become a productive member of society. However, the continued term of supervised release and the conditions attached thereto are preventing the Defendant from reaching his full potential. They are also preventing the Defendant from being able to fully repay his victims.

CONCLUSION

THEREFORE, the Defendant respectfully requests that this Honorable Court schedule an evidentiary hearing on his Motion to Modify Sentence so that the Defendant may produce evidence and argument to support his request to end his term of supervised release (and/or modify its terms).

A copy of this Motion to Modify Sentence has been served upon the U.S. Attorney's Office via electronic mail, according to the rules and procedures of the Southern District of Georgia's Electronic Case Filing system.

Respectfully submitted this 24th day of June, 2019.



W. Joseph Turner
Attorney for Defendant
State Bar No.: 513605

The Turner Firm, LLC
Attorneys at Law
7 E. Congress Street
Suite 611-B
Savannah, GA 31401
T: (912) 226-7662
F: (912) 226-7664